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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Revision of the Commission's Rules
to ensure compatibility with enhanced
911 emergency calling systems

CC Docket No. 94-102

DOCKET FILE COPY ORIGINAL

To: The Commission

Reply Comments of the Rural Cellular Association

The Rural Cellular Association ("RCA") submits the following Reply Comments in response to Comments filed herein pursuant to the Notice of Proposed Rulemaking ("NPRM") in this docket released by the Commission on October 19, 1994. Review of these Comments reflects broad support for the Commission's goal of ensuring 911 availability to consumers of mobile telecommunications services. There is also a general consensus, however, that the Commission's proposal to attain this goal by government mandate may be counterproductive. In support thereof, RCA shows the following:

1. In its Comments filed herein on January 9, 1995, RCA noted its support of the Commission's tentative conclusion that access to emergency services should be available to consumers of mobile telecommunications services. Over the past several years, RCA members have participated proactively with Public Safety Answering Points ("PSAPs") in their areas to assist in making emergency services available to the mobile public. RCA suggested, however, that while access to emergency services via 911 is already virtually universally available, the Commission's more ambitious goal, the availability of mobile enhanced emergency services, or E-911, would best be met through reliance upon market forces which

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would not only encourage the development of a cost-efficient technology to implement this service, but would also provide the impetus for service provision.

2. These concerns are echoed throughout the record in this proceeding. There exists general industry consensus that the Commission's proposal is premature, inasmuch as the technology for the provision of enhanced 911 services in the wireless communications context has not yet been developed and standardized. For example, CTIA notes that many outstanding technical issues preclude the Commission's adoption of definitive rules and timing requirements, and suggests that an Industry Advisory Committee be established to address technical and policy issues.¹ Nextel Communications, Inc. also suggests that the more appropriate Commission role would be to facilitate coordination among all industry segments to work toward technical solutions; once that goal is met, timetables may be developed.²

3. RCA agrees that a federal mandate is premature since technical capabilities and standards have not been developed in the wireless context. Furthermore, this approach is unnecessarily expensive, because, as noted by Vanguard Cellular Systems, Inc.,

¹/ Comments of CTIA at pp. 6-8, 11.

²/ Comments of Nextel Communications, Inc. at p. 2. American Personal Communications ("APC") concurs in this approach, suggesting that the Commission should encourage an industry effort to work toward technological compatibility. Comments of APC at pp. 2, 4-5. OPASTCO also suggests that a federal mandate for the provision of mobile E-911 services is inappropriate; it advocates the development of voluntary technical guidelines. Comments of OPASTCO at p. 6.

the establishment of standards will substantially lower the costs of development and manufacturing, which will, in turn, accelerate the introduction of services.³ Just as market forces will provide efficiencies in the development of necessary technology, so, too will the market encourage the efficient deployment of facilities and introduction of wireless E-911 service.

4. RCA has voiced its concern that the absence of technical certainty, coupled with a disregard for market forces, may yield costly and inefficient E-911 services. This concern is mirrored by the many commenters which join RCA in advocating a market approach to the provision of enhanced 911 services.⁴ For example, the Texas Advisory Commission submits that the market, not a federal mandate, should determine the availability of E-911 services.⁵ Similarly, local authorities have urged the Commission to consider the cost-effectiveness of an E-911 mandate.⁶ Clearly, the record demonstrates a lack of consensus even among E-911 service

³/ Comments of Vanguard Cellular Systems, Inc. at p. 13. See also Comments of the NYNEX Companies at p. 9 (the cost of premature imposition of E-911 service requirements will have an "adverse impact on the provision of wireless service that would far exceed the public benefits associated with its implementation.")

⁴/ See, e.g., Comments of Pacific Bell, Nevada Bell, Pacific Bell Mobile Services at p.3; NYNEX Companies at p. 10; BellSouth at p. 21; GTE at p. 5; and US WEST at p. 14.

⁵/ Comments of Texas Advisory Commission at p. 3.

⁶/ Hillsborough County, Florida raises the issue of the cost of enhanced services to be incurred by the emergency systems themselves, including the costs of networking, hardware and software. Comments of Hillsborough County, Florida at para. 1. Similarly, Lake County, Florida encourages the Commission to study the cost-effectiveness of enhanced services.

providers. RCA therefore submits that the Commission consider the negative economic implications of its proposal to impose E-911 service requirements where neither the technology, the need nor the demand for the service is certain.

5. The record in this proceeding does not demonstrate that the costs involved in the immediate imposition of federally-mandated E-911 service requirements equal the anticipated benefits. RCA submits that the public interests in health and safety, as well as economy and efficiency, can best be served by the implementation of a rational technical plan designed to meet concrete goals.

6. In its Comments, RCA also suggested that, in the event the Commission imposes a federal mandate for the provision of mobile enhanced 911 service, it should consider the implementation of an appropriate cost recovery mechanism for mobile service providers.⁷ Several parties concur, suggesting various methodologies for the Commission's consideration. Some commenters propose the establishment of a national fund to help defray carriers' costs.⁸ Others address the issue more generally, agreeing with RCA's basic premise that adoption of a cost-recovery procedure should accompany any attempt to mandate the provision of a specific service or class of services.⁹ Where the market is not permitted to regulate the introduction or provision of services, it

⁷/ Comments of RCA at p. 9.

⁸/ Comments of Pacific Bell, Nevada Bell and Pacific Bell Mobile Services at p. 3.

⁹/ See, e.g., Comments of Nextel Communications, Inc. at p. 7.

cannot be expected to function efficiently as a pricing mechanism.

7. RCA also notes that many carriers commenting in this proceeding agree with RCA's position that it may be inappropriate to assume that landline standards for enhanced 911 services are appropriate in the mobile communications context. Wireline 911 service has been available in the United States since its introduction in 1965. The Commission's Network Reliability Council ("the Council") performed a study of 911 services and found that 89 percent of the wireline access service lines in the United States are served by some form of 911 service. According to the Council, there are different levels of 911 services available depending on the location, from basic 911 to enhanced 911 service.¹⁰ Given the thirty-year development of wireline 911 service in this country, and the fact that the technology to provide wireless enhanced 911 services is not yet available, a federal mandate requiring the provision of enhanced mobile 911 service is unrealistic. RCA submits that the implementation of enhanced mobile 911 service will best be accomplished through a response to market forces by wireless service providers.

8. For example, GTE suggests that different standards should apply to wireline and wireless E-911 services due to the inherent differences between these systems. The Commission, GTE submits, should not assume that enhanced 911 features developed for use in wireline telephone networks are equally attainable in the wireless context -- the differences that exist between wireless and wireline

¹⁰/ NPRM at paras. 3 and 5.

service support establishing a different set of E-911 standards for wireless systems. Certain E-911 features, such as Automatic Location Identification ("ALI"), may not be as beneficial for calls placed over wireless networks due to the mobility of the wireless unit and the fact that the handset's location may differ from the emergency site.¹¹

9. Similarly noting differences between wireline and wireless systems such as capacity, mobility, and susceptibility to fraud, Springwich Cellular Limited Partnership states that the Commission should not adopt a comparable standard between wireline and wireless service providers for the provision of 911 service.¹² NYNEX also notes that the Commission does not account for the inherent difference between the two systems -- the existence (or the lack of) a single, static location of the calling party.¹³ RCA agrees with the commenters cited herein and reiterates its position that the fundamental nature of cellular telephone use is different from wireline telephone use since cellular subscribers are, by definition, "mobile."¹⁴

10. The record in this proceeding reflects a consensus of opinion that the public will benefit from the availability of 911 services to mobile communications subscribers. RCA and other

¹¹/ Comments of GTE at p. 5.

¹²/ Comments of Springwich Cellular Limited Partnership at pp. 4-5.

¹³/ Comments of NYNEX Companies at p. 8.

¹⁴/ Comments of RCA at p. 5.

carriers are concerned, however, that the utility of E-911 mobile services is dependent upon an implementation plan which allows the rational allocation of resources, and ultimately, the public's access to useful and affordable emergency services. Accordingly, RCA respectfully submits that the most effective and efficient answer to the issues raised in this proceeding will be found in the response of carriers to market demand and competitive forces in the development and provision of enhanced 911 services in the mobile communications industry.

Respectfully submitted,

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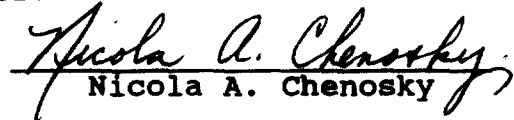
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